

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

UNITED STATES' REQUESTED VOIR DIRE QUESTIONS

COMES NOW the United States of America, by and through Leura G. Canary, United States Attorney for the Middle District of Alabama, and requests this Court to propound the attached questions to the jury venire in this case.

Respectfully submitted this the 31st day of July, 2006.

LEURA G. CANARY
UNITED STATES ATTORNEY

s/ A. Clark Morris
A. CLARK MORRIS
Assistant United States Attorney
One Court Square, Suite 201
Montgomery, Alabama 36104
Telephone: (334) 223-7280
Fax: (334) 223-7135
E-mail: clark.morris@usdoj.gov

1. Based on the information you have heard in Court today concerning this case, have any of you heard or read anything about this case on television, radio or in the newspaper?

If so, based on what you have heard or read, have you formed any opinion as to the guilt or innocence of any of the defendants?

If so, based on what you have heard or read, have you formed an opinion as to what, if anything, really happened?

2. Have any of you discussed any aspect of this case with anyone who claimed to have some knowledge of what actually occurred?

If so, with whom and under what circumstances? What knowledge did this person claim to have? Have you formed some opinion based on what this person told you?

3. Has any member of the panel, or a relative or close friend ever been employed by a local, state, or federal law enforcement agency?

If so, what position was or is held?

4. Has any member of the panel ever had an unpleasant experience involving law enforcement?

If so, please explain.

5. Has any member of the panel, or a relative or close friend ever been employed by a law firm or other organization which participates in the defense of criminal cases?

If so, please state their names, all of the types of law that they practice and the location of their practice.

If a relative was or is so employed, do you often discuss their jobs with them?

6. Has any member of the panel ever had any dealings with the Drug Enforcement Administration, Montgomery Police Department, the Office of the United States Attorney, the Department of Justice, or any local office of the District Attorney?

If so, please elaborate.

7. Has any member of the jury panel, or a member of his or her family, ever been employed by local, state or the federal government?

If so, in what capacity?

8. Has any member of the panel ever had any training in law or in law enforcement?

If so, please describe.

9. Does any member of the panel know any of the defendants, or any member of a defendants' family, or any friends of the defendants, on either a personal, business, or professional basis?

If so, who, and in what capacity?

10. Has any member of the panel, or a relative or close friend, ever been a witness to a crime?

If so, what type of crime and when did it occur? Was the case prosecuted?

Did you or your relative or close friend testify? With regard to your participation in the case, was there anything in your dealings with the police, the court, the prosecutor, or the defense lawyer that left you unhappy or unsatisfied? Please elaborate.

What was the result?

Were you satisfied with the result?

11. Do you or any of your friends or relatives know any of the attorneys in this case? If so, who and how?

12. Do you know any other member of the jury panel? If so, who and how?

13. Have you or any friend or relative ever been arrested or convicted for any crime other than a traffic offense?

If so, when, and for what? By virtue of your experience, will you be able to be entirely impartial to both the prosecution and the defense in this case?

14. Is anyone a member of a group such as NORML that advocates legalization of illegal drugs? Does anyone believe that illegal drugs, such as cocaine or marijuana, should be legalized?

15. Does any member of the panel believe the government spends too much money and other resources to stop the use and sale of illegal drugs?

16. Has any member of the panel, or have any of your friends or relatives, ever had any dealings with the Bureau of Alcohol Tobacco and Firearms?

If so, please explain.

17. Does any member of the panel, or have friends or relatives, who observe or commemorate April 19, 1993?¹

18. Does any member of the panel have a strong opinion about the Bureau of Alcohol, Tobacco, Firearms and Explosives, otherwise known as the ATF?

¹Date of the ATF incident in Waco, Texas.

19. Does any member of the jury believe that the federal government should not be enforcing the gun laws?

20. Do any of you have any convictions, whether they may be moral, religious, philosophical or otherwise that would prevent you from being a fair and impartial juror in this case or that would prevent you from sitting in judgment on your fellow man?

21. To admit to having some sympathy for the defendants or the government in this case is nothing to be ashamed of and does not reflect badly upon you as a person. However, both the government and the defendants are entitled to have this case heard by a fair and impartial jury that will decide the case solely according to the evidence admitted in this Court and according to the Court's instructions on the law. The law provides that the jury may not be governed by sympathy, prejudice, or public opinion. With this in mind, do any of you have any reason why you would be unable to give either the government or the defendant a fair trial based solely upon the evidence admitted at the trial and the instructions given by the Court?

22. Can all of you decide this case solely on the evidence presented in this courtroom, applying the law as given to you by the Court, and decide it without bias, prejudice, and sympathy?

23. Is there any reason why any of you would be unable to reach a fair and impartial verdict based solely upon the evidence submitted during the trial and the instructions which the judge gives you?

24. Do any of you have any members of your family or friends who are currently incarcerated in any penal institution, jail, or community based correctional facility?

If so, what is your relationship to that individual and what crime did he/she commit?

If so, do you feel that this relationship will prevent you from being a fair and impartial juror in this case?

25. Have you, a member of your immediate family or close friend ever been questioned or accused of a crime that involved a controlled substance?

26. Do any of you have any physical problems which will interfere with your service as a juror, or will prevent you from reading the documents that are introduced into evidence or from hearing the testimony that will come from the witness stand?

27. Do each and every one of you understand that during the course of the trial an attorney is not permitted to speak to the jurors and, therefore, if you see an attorney in the hall or on the street, you should not hold it against the attorney if he or she does not acknowledge you or speak to you?

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UNITED STATES OF AMERICA)
)
V.) 2:06-cr-64-MHT
)
DEANDRA TWAIN LEWIS, and)
MARQUISE ANTOINE REYNOLDS)

CERTIFICATE OF SERVICE

I hereby certify that on July 31, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Tony Axam and Wesley A. Pitters.

LEURA G. CANARY
UNITED STATES ATTORNEY

s/ A. Clark Morris
A. CLARK MORRIS
Assistant United States Attorney
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